

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

MARC VEASEY, <i>et al</i> ,	§	
	§	
Plaintiffs,	§	
VS.	§	CIVIL ACTION NO. 2:13-CV-00193
	§	
RICK PERRY, <i>et al</i> ,	§	
	§	
Defendants.	§	

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO
FILE RESPONSE TO TEXAS LEAGUE OF YOUNG VOTERS' MOTION TO
COMPEL (ECF NO. 395)**

Defendants and Plaintiff-Intervenors Texas League of Young Voters' Education Fund ("TLYVEF") previously agreed to a briefing schedule for TLYVEF's Motion to Compel. *See* ECF No. 395 ("Motion"). This agreement provided that Defendants would have 7 days to file a response to the Motion, requesting that the deadline for Defendants' response be July 17. *Id.* at fn. 2. Subsequently this Court ordered that any response to the Motion be filed by July 16, 2014, (ECF No. 397). Defendants have made every effort to comply with this Court's request, but are unable to do so due to significant demands on the counsel for the Defendants.

Defendants have been diligently taking deposition testimony this week and last. Defendants took three depositions yesterday and will take another three today. Several of these depositions required travel to cities outside Austin. Last Friday, counsel for the Defendants were also tied up in two depositions in Houston. In addition to these discovery demands, counsel for the Defendants are working

diligently to prepare expert reports and comply with today's deadline to file answers in response to each of the complaints filed in this case. As such, Defendants respectfully request that this Court withdraw its July 10 Order and enter the attached proposed order establishing a July 17, 2014 response deadline. Defendants have conferred with counsel for TLYVEF, Imani Clark, Texas NAACP-MALC and Ortiz Plaintiffs, and each consents to this motion for extension of time. Defendants have not yet heard whether the Veasey-LULAC Plaintiffs oppose this motion.

Dated: July 16, 2014

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on July 16, 2014, a true and correct copy of the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ John B. Scott
JOHN B. SCOTT